

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Sharonn E. Thomas,  
Debtor,

THE BANK OF NEW YORK MELLON f/k/a  
THE BANK OF NEW YORK as Trustee for  
FIRST HORIZON ALTERNATIVE  
MORTGAGE SECURITIES TRUST 2006-  
FA2,  
Respondent

Chapter 7

Case No.: 18-17430-elf

Hearing Date: December 15, 2021  
Time: 10:00 a.m.

**RESPONSE OF THE BANK OF NEW YORK MELLON f/k/a THE BANK OF NEW  
YORK AS TRUSTEE FOR FIRST HORIZON ALTERNATIVE MORTGAGE  
SECURITIES TRUST 2006-FA2  
TO TRUSTEE'S MOTION TO SELL CERTAIN REAL ESTATE ASSETS FREE AND  
CLEAR OF LIENS AND ENCUMBRANCES, SURCHARGE CERTAIN SECURED  
CREDITORS AND RESOLVE CERTAIN DISPUTES**

THE BANK OF NEW YORK MELLON f/k/a THE BANK OF NEW YORK as Trustee  
for FIRST HORIZON ALTERNATIVE MORTGAGE SECURITIES TRUST 2006-FA2,  
(hereinafter "Respondent"), by and through its undersigned counsel at Milstead & Associates,  
LLC, responds and objects to Trustee's Motion to Sell Certain Real Estate Assets Free and Clear  
of Liens and Encumbrances, Surcharge Certain Secured Creditors and Resolve Certain Disputes,  
in a limited manner, as follows:

1. Respondent's loan is secured by a mortgage on Debtor's property located at 504  
N 57<sup>th</sup> Street, Philadelphia, PA 19131 ("Premises").
2. The proposed Order should provide that, after reasonable notice of the closing  
date from Trustee, Respondent shall provide to Trustee in writing an actual payoff amount,

good at least to the date of closing.

3. The proposed Order should provide that Respondent remains entitled to receive the full payoff amount on its loan due as of the date of closing on the Premises.

4. The proposed Order should provide for proper disbursement of sale proceeds, first for real estate taxes and water and sewer liens in connection with ownership of the Premises; then mortgage liens on the Premises, in order of recording; then administrative costs of sale associated with the Premises; then unsecured creditors, the Trustee and “Co-Owner,” if any.

**WHEREFORE**, the Respondent, respectfully requests that this Honorable Court enter an Order consistent with Respondent’s requests and such other relief as may be appropriate.

Respectfully submitted,

Milstead & Associates

Dated: December 3, 2021

BY: /s/ Lorraine Gazzara Doyle  
Lorraine Gazzara Doyle, Esquire  
Milstead & Associates, LLC  
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Attorneys for Respondent

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**CERTIFICATION OF SERVICE**

Lorraine Gazzara Doyle, Esquire counsel for THE BANK OF NEW YORK MELLON f/k/a THE BANK OF NEW YORK as Trustee for FIRST HORIZON ALTERNATIVE MORTGAGE SECURITIES TRUST 2006-FA2, hereby certifies that a copy of the Response to Trustee's Motion to Sell Certain Real Estate was served upon the following persons via electronic transmission or by regular first-class mail, postage pre-paid on December 3, 2021, addressed as follows:

Terry P. Dershaw, Trustee Dershaw Law Offices P.O. Box 556 Warminster, PA 18974-0632 <i>via electronic transmission and regular mail</i>	Gary F. Seitz, Esquire GELLERT SCALI BUSENKELL & BROWN, LLC 8 Penn Center 1628 John F. Kennedy Blvd., Suite 1901 Philadelphia, PA 19103 <i>via electronic transmission and regular mail</i>
Damien Nicholas Tancredi, Esquire Flaster Greenberg P.C. 1835 Market Street Suite 1050 Philadelphia, PA 19103 <i>via electronic transmission and regular mail</i>	Joshua Louis Thomas, Esquire Joshua L. Thomas & Associates PO Box 415 Pocopson, PA 19366 <i>via electronic transmission and regular mail</i>

Sharonn E. Thomas 856 North 29 <sup>th</sup> St. Philadelphia, PA 19130 <i>via regular mail</i>	
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MILSTEAD & ASSOCIATES, LLC

DATED: December 3, 2021

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